

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION**

KIERAN RAVI BHATTACHARYA

Plaintiff,

v.

JAMES B. MURRAY, JR., et. al.,

Defendants.

Civil Action No.: 3:19-CV-00054

**PLAINTIFF’S MOTION TO SEAL EXHIBITS B – F TO
PLAINTIFF’S OPPOSITION TO JOINT MOTION TO COMPEL AND EXHIBIT 34**

Plaintiff Kierian Ravi Bhattacharya (“Mr. Bhattacharya”), by counsel, respectfully moves to seal Exhibits B – F to Plaintiff’s Objections to Magistrate’s Report & Recommendations. These contain sensitive information about Plaintiff’s medical history and treatment, including medical records that are protected under federal and state law. Alternatives to sealing are not possible here given the nature of the Stipulated Protective Order entered in this matter (Dkt #150), which by its terms limits access to highly confidential documents to attorneys, attorneys’ clerical employees and support staff, experts, witnesses, court personnel or others only upon two-party consent. *See* Stipulated Protective Order (Dkt #150) at 8-9. Sealing is requested indefinitely, due to the sensitive nature of the brief and exhibits and the requirements of the Stipulated Protective Order entered by this Court.

Dated: November 26, 2021

Respectfully submitted,

/s/ Michael J. Lockerby
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